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6 Attorneys for Patrick McCaffrey, Sally  
McCaffrey, and the McCaffrey Family Trust.

7  
8 UNITED STATES BANKRUPTCY COURT  
9  
NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

10 In re  
11 PG&E Corporation,  
and  
12 PACIFIC GAS AND ELECTRIC  
COMPANY,  
14 Debtors.

15 [ ] Affects PG&E Corporation  
16 [ ] Affects Pacific Gas and Electric Company  
17 [x] Affects both Debtors

18 \*All papers shall be filed in the Lead Case,  
No. 19-30088-DM,

Case No. 19-30088-DM

Chapter 11  
Lead Case, Jointly Administered

**DECLARATION OF RICHARD  
FRANKEL IN SUPPORT OF MOTION  
PURSUANT TO FED. R. BANKR. PROC.  
7015 AND 7017 FOR AN ORDER  
DEEMING PROPOSED AMENDED  
CLAIM TO RELATE BACK/OR  
PURSUANT TO FED. R. BANKR. P.  
9006(b)(1) TO ENLARGE THE TIME FOR  
PATRICK MCCAFFREY, SALLY  
MCCAFFREY, AND THE MCCAFFREY  
FAMILY TRUST TO FILE PROOF OF  
CLAIM**

Date: August 4, 2020  
Time: 10:00 a.m.  
Crtrm.: Courtroom 17  
450 Golden Gate Avenue  
San Francisco, CA 94102  
Judge: Hon. Dennis Montali

Objection deadline: July 28, 2020  
4:00 p.m. (Pacific Time)

I, Richard Frankel, hereby declare as follows:

1. I am an attorney at law duly licensed to practice before the courts of the State of Texas, and in numerous federal courts. I am a lawyer with Reiner, Slaughter & Frankel, LLP,

1 based in Redding, California.

2       2. My law firm represents wildfire victims who sustained losses from the Camp Fire  
3 in 2018. My firm has timely filed over 800 Proof of Claim forms with Prime Clerk for losses  
4 clients have suffered as a result of these fires.

5       3. Patrick and Sally McCaffrey filed a proof of claim without counsel on August 27,  
6 2019, well before the Bar Claim Deadline of December 31, 2019. At the time the McCaffreys did  
7 not appreciate the difference between a trust beneficiary and a trustee of a trust, so they did not  
8 identify the trust as a claimant.

9       4. In June 2020 the McCaffreys hired my firm to gather information and present their  
10 claim; therein I discovered that the McCaffreys house belonged to their trust. Thus, part of my  
11 clients' proof of claim also included damages which my clients' trust actually incurred (as owner  
12 of record of the property damaged). The proof of claim does not identify the trust as a claimant or  
13 in any capacity. The name of the trust is the McCaffrey Family Trust. Patrick and Sally  
14 McCaffrey are trustees of the trust.

15       5. If this Court grants the relief requested in the Motion here, I am prepared to file an  
16 amended proof of claim to reflect the trust as a proper claimant for certain real property damages.  
17 The amended proof of claim would change neither the claimants' contact information nor the  
18 nature and amount of damages they claim.

19       6. I am over eighteen years of age, of sound mind, and fully-competent to make this  
20 declaration. All statements in this declaration are based on my own personal knowledge and  
21 observation and from my review of the court and business records in this case, or upon  
22 information and belief as indicated. If called to testify on this matter, I can and would competently  
23 testify to the matters set forth in this Declaration.

24       I declare under penalty of perjury pursuant to the laws of the United States of America that  
25 the foregoing is true and correct.

26       Executed this 14th day of July, 2020, in Houston, Texas.

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DOWNEY BRAND LLP

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By:   
RICHARD FRANKEL